HALOCARBON™

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November 20, 2020

Ms. Ingrid Feustel
Chemical Control Division
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001]

RE: Small Entity Representative Pre-Panel Comments Regarding EPA's Risk Management of

Methylene Chloride Under TSCA

Dear Ms. Ingrid Feustel:

As follow-up to our email correspondence with you, Niva Kramek, and John Mikan, Halocarbon would like to provide further information regarding Halocarbon's use of Methylene Chloride in an engineered closed loop system. Thank you for providing more details about how the EPA estimated risk considering the ADC, AT, LADC, and ATc. As shared before, as a member of SOCMA, Halocarbon is striving to protect both our employees and the communities managing risks using science-based evidence and by applying the concepts of the Hierarchy of Controls. John Mikan from Experien Health Sciences, Inc, a recognized industry expert in these areas, has been a partner for several years helping Halocarbon evaluate and address various risks.

With Mr. Mikan's expertise, we have conducted our own risk assessment (see attached) using the same models / tools as the EPA's risk assessment but applied to our process/use (Closed loop engineered system). This assessment clearly shows Halocarbon does not belong in the Cellulose Triacetate Film Production use/exposure category described in EPA's risk assessment. The results of our risk assessment conclude that all MOEs exceed the applicable target MOEs and that all cancer risks are less than 10E-04, with and without regards to the use of respiratory protection and that significant dermal exposures, while possible, can be easily controlled through use of even the least protective gloves. Therefore, the analysis concludes that our current engineering controls, administrative controls, and PPE controls, based on the existing OSHA MCL standard, are more than adequate.

We appreciate the opportunity to provide this input and hope that you will agree that our use of methylene chloride in a closed loop system is an application that was not adequately considered in EPA's risk assessment. As a member of SOCMA and ACC, we hold ourselves to a higher standard of ChemStewards and are demonstrating that our use of the Hierarchy of Controls for evaluating and managing

the risk of using methylene chloride in our closed loop system under the existing OSHA MCL standard is adequate. We know that a complete prohibition on methylene chloride use would have catastrophic impacts on Halocarbon and would negatively impact the drug markets due to the unavailability of the inhalation anesthetics we manufacture. Based on this further information, Halocarbon is again asking EPA to consider an exclusion of closed loop systems from the rule making, given the low risk, use of controls, and low potential for exposure and/or consider adopting OSHA's MCL standard as an adequate risk control.

Sincerely,

Wanda Copeland Smith
Product Stewardship Specialist
Halocarbon